

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Kerry Green  
Debtor

Kerry Green,  
Movant(s)/Debtor,  
v.

Nationstar Mortgage LLC as servicer for The  
Bank of New York Mellon f/k/a The Bank of  
New York as Trustee, in trust for the registered  
holders of NAAC Reperforming Loan REMIC  
Trust Certificates Series 2004-R1,  
Respondent/Creditor

CHAPTER 13

BANKRUPTCY CASE NUMBER  
17-13040/ELF

**RESPONSE OF NATIONSTAR MORTGAGE LLC AS SERVICER FOR THE BANK OF  
NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS TRUSTEE, IN TRUST  
FOR THE REGISTERED HOLDERS OF NAAC REPERFORMING LOAN REMIC  
TRUST CERTIFICATES SERIES 2004-R1 TO DEBTOR'S MOTION FOR  
AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND  
ENCUMBRANCES**

Nationstar Mortgage LLC as servicer for The Bank of New York Mellon f/k/a The Bank of New York as Trustee, in trust for the registered holders of NAAC Reperforming Loan REMIC Trust Certificates Series 2004-R1 (“Mr. Cooper” or Respondent”), by and through its counsel, Shapiro & DeNardo, LLC, hereby responds to Debtor's Motion for Authority to Sell Real Property Free and Clear of Liens and Encumbrances, and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without sufficient information to admit or deny the averment.

5. Upon information and belief, the averment in Paragraph 5 is admitted. By way of further response, Exhibit "A" speaks for itself.

6. Upon information and belief, the averment in Paragraph 6 is admitted. By way of further response, Exhibit "A" speaks for itself.

7. Denied. Respondent is without sufficient information to admit or deny the averments.

8. Denied. By way of further response, Respondent is not opposed to the sale of the property located at 4018 Parrish Street, Philadelphia, PA 19146 (the "Property") so long as it is paid in full. As of the date of this filing, the approximate amount necessary to pay off the loan is \$96,183.21. In the event the sale does not support satisfying the loan, Debtor would need to apply for a short sale which would be subject to approval. Upon request, Respondent shall provide an updated payoff at the time of closing.

9. Denied. Respondent is without sufficient information to admit or deny the averments.

10. Denied. Respondent is without sufficient information to admit or deny the averments.

WHEREFORE, Mr. Cooper respectfully requests that its secured claim be paid in full.

Respectfully submitted,

Dated: March 26, 2019

S&D File #:18-059237

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